



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

September 17, 2015

Toni Ristau
354th Fighter Wing, Public Affairs Office (354 FW/PA)
354 Broadway Avenue, Suite 15A
Eielson AFB, AK 99702

Dear Ms. Ristau:

Thank you for the opportunity to review the United States Air Force F-35A Operational Beddown – Pacific Draft Environmental Impact Statement (EPA Project No. 15-0022-DOD). We have reviewed this Draft EIS in accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA.

Overall we find the Draft EIS to be well-written and clearly organized. We appreciate the numerous colored maps, summary tables and index. We also commend the Air Force for conducting such extensive stakeholder outreach and consultation efforts. Including the actual scoping comments received by the Air Force, instead of a scoping summary report was also helpful.

However, based on our review, we have identified concerns regarding the potential impacts on waters of the U.S., contaminated sites and noise receptors, as well as the limited range of alternatives. Therefore, we have assigned a rating of EC-2 (Environmental Concerns – Insufficient Information) to the Draft EIS. For your reference, a copy of the rating system used in conducting our review is enclosed.

Wetlands Impacts

In our April 16, 2015 scoping letter we recommended that the Draft EIS include information that demonstrates compliance with the Clean Water Act 404(b)(1) guidelines. This information is not contained in the Draft EIS. We recommend that the Final EIS include information regarding the types and functions of wetlands to be impacted by the proposed action. We believe this information is useful, not only for compliance with the 404(b)(1) guidelines but also for full evaluation and disclosure of impacts under NEPA. For facilities that are currently proposed for placement in floodplains and wetlands, we would like to see more information about alternatives considered for more upland placement (e.g., a more northwest placement of the new storage hangar along the South Loop). This information could be included in Appendix D: Detailed Resource Information, in a separate appendix or in the body of the Final EIS document.

Comprehensive Environmental Response, Compensation and Liability Act Sites

As stated in our April 16, 2015 scoping letter, we believe the proposed action has the potential to impact known CERCLA Operable Units as well as sites that may not be identified to date. We continue to recommend precaution in the development of any areas for new construction. We are pleased that the Draft EIS notes that close coordination with the Alaska Department of Environmental Conservation and

the Environmental Protection Agency will occur. Specifically we encourage close coordination with the Remedial Project Engineer for Eielson AFB (Carolyn Tallant, Air Force Civil Engineering Center, carolyn.tallant@us.af.mil or (907) 377-1666) to ensure that all required steps are taken to comply with the institutional and land use controls prior to any ground disturbance as well as the EPA Region 10 Remedial Project Manager, Jackie Kramer (kramer.jackie@epa.gov or (907) 271-3541), on any proposed construction or operational activities that have the potential to impact sites identified in the various CERCLA Records of Decision.

Additionally, we recommend that language on page 3-93 under *Environmental Restoration Program* be revised to more accurately reflect that the State of Alaska does not regulate any contaminated sites under the Resource Conservation and Recovery Act, which sites containing CERCLA contaminants are ERP-sites, and the State-led petroleum sites are Compliance Restoration Program sites. We suggest the following language: “The U. S. EPA and State of Alaska jointly regulate the sites with CERCLA contaminants. Petroleum-contaminated sites are designated as Compliance Restoration Sites and are addressed under State of Alaska regulations.”

Also, we believe statements pertaining to remedies that are in place are not accurate. Following the 2013 Five Year Review, most of the remedies were found to be not protective, and Eielson is re-opening the Remedial Investigations for many of these sites. We recommend that wording be changed to reflect the actual effectiveness of existing remedies.

Noise Impacts

Additionally, we are concerned with the increase in occurrence and change in type of noise impacts, particularly to sensitive populations in the Eielson-Moose Creek area. The Draft EIS states there is potential for significant impacts both on-base and off-base, and that noise exposure mitigation measures will be identified through agency and public review and input.

We recommend that the Air Force develop a working group comprised of interested and potentially affected stakeholders to specifically address this issue. This working group should be informed of common mitigation measures successfully employed elsewhere for these types of operations and then be offered the opportunity to provide recommendations for inclusion in the Final EIS. They should also be provided with a summary of Appendix E: Noise Modeling, Methodology and Effects. Because noise impacts have the potential to be significant, we believe clear and measurable mitigation measures need to be included in the Final EIS. We also recommend that such impacts be considered fully in the Environmental Justice and Health Impacts analyses in the Final EIS.


Range of Alternatives

In our April 16, 2015 scoping letter we requested that the Draft EIS evaluate a reasonable range of alternatives, including alternatives that may minimize environmental degradation. The Draft EIS evaluates one action alternative, the Air Force’s Proposed Action (stationing of up to 54 F-35A aircraft at Eielson Air Force Base) and the No Action alternative. Additional action alternatives were eliminated based on an “Enterprise-Wide Study”; however, the Draft EIS does not provide detailed explanation as to why other action alternatives were not considered or why some were eliminated. For example, it does not explain whether basing one squadron at a particular location and another at a different location was or was not reasonable.

Because the proposed action will result in substantial changes at Eielson AFB, including an increase of nearly 50% of the installation's current population of service members, family members and contractors, it would seem that additional, reasonable alternatives would exist. If other alternatives were evaluated early in the process, and determined to be not reasonable, it may be that the standards used to rule out such alternatives were restrictive and limiting to the point that they precluded the ability to seriously consider a full range of reasonable alternatives. We recommend that the Final EIS either provide more detailed information concerning other action alternatives or fully evaluate additional, reasonable action alternatives.

Thank you for the opportunity to review and comment on this Draft EIS. If you have questions about our comments, please contact me at (206) 553-1601 or reichgott.christine@epa.gov, or contact Jennifer Curtis of my staff at (907) 271-6324 or curtis.jennifer@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure:

1. US EPA Rating System For Draft Environmental Impact Statements

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.